

In The United States District Court
For The District of Delaware

James L. Lewis
v
plaintiff

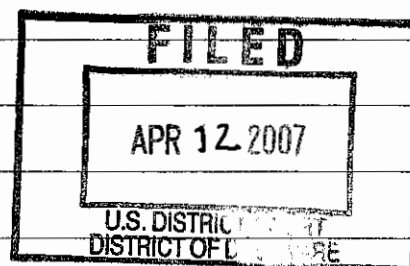
resubmit

Motion For
Appointment of
Counsel

Civil Action No.

06-236-SLR

Lt Cheryl Morris, Dir
Chris Klee administrative
Michael Knight and all officers
and supervisors of the prison
systems in State of Delaware
(to be named later, now known
as John Does) who violated
Constitutional rights mentioned



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Pursuant to 28 USC § 1915(e)(1) plaintiff
(or plaintiffs) moves for an order appointing
counsel to represent him in this case. In
support of this motion plaintiff states:

1. Plaintiff is unable to afford counsel. He has
requested leave to proceed in forma pauperis and was
granted.

2. Plaintiff's imprisonment will have greatly
limited his ability to litigate. The issues of this
case are complex, and will require significant
research and investigation. Plaintiff has limited access
to the law library and limited knowledge of the law.

3. A trial in this case likely will involve

counsel can explain the applicable legal principles to the complainant and ... limit litigation to potentially meritorious issues. In addition, appointment of a lawyer provides the indigent inmate with an opportunity to obtain representation equally qualified with the professional counsel usually provided by the state for the defendant.

Henington v Walker 616 F2d 795

Counsel can address all issues that appear to have merit within the law.

investigate the facts. (prisoners released or transferred to other prisons.

ability to present the case. *Tabor v Hane* 6 F3d 156

complexity of the case because it involves question of constitutional violation (reasons for retaliation)

conflicting testimony, and Counsel would better enable plaintiff to present evidence and cross examine witnesses.

4. Plaintiffs inability to get State documents involved in this case and to obtain documents showing inmate assignments and work schedules done by other inmates are impossible for them and would dictate subpoenas done by an attorney.

5. Plaintiffs inability to talk to other inmates who have come forward to back up plaintiffs complaints and allegations. And ability to question guards has already been shown in a disciplinary hearing plaintiff was already denied access to witnesses against the state.

Wherefore, plaintiffs request that the court appoint a member of the bar as counsel to represent plaintiffs in the case.

6/27/2006

4/10/2007

James St. Louis

446 518

1181 Paddock Rd
Smayna, Ill.

Certificate of Service

I, James St. Louis, hereby certify that I have served a true
and correct copy(ies) of the attached: Motion for more
Definite Statement of Apt of Counsel upon the following
parties/person (s):

TO: United States District Court TO: _____
District of Delaware _____
Lockbox 18 _____
844 King Street _____
Wilmington Delaware 19801 _____

TO: Eileen Kelly TO: _____
Deputy Attorney General _____
820 N. French St. 6th Floor _____
Wilmington _____
Delaware 19801 _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 10th day of April, 2007
James St. Louis
SB1 446518